

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AIR PRODUCTS LLC,

Plaintiff,

vs.

CIECH, S.A.,

Defendant.

Case No. 5:12-cv-6953-JKG

JOINT STIPULATION ON SEALING OF DOCUMENTS

Pursuant to the Court's April 26, 2013 Order, Plaintiff Air Products LLC and Defendant Ciech, S.A. have conferred regarding the continued sealing of the Memorandum of Law in Support of Defendant's Motion to Dismiss and the Declaration of Jonathan E. Paikin in Support of Defendant's Motion to Dismiss. Plaintiff and Defendant agree and stipulate as follows:

A. Memorandum of Law in Support of Defendant's Motion to Dismiss

1. Defendant is filing, concurrently with this stipulation, a public redacted version of the Memorandum of Law in Support of Defendant's Motion to Dismiss containing redactions that the parties have agreed are necessary to protect confidential business information.

2. The unredacted version of the Memorandum of Law in Support of Defendant's Motion to Dismiss should be maintained under seal.

B. Declaration of Jonathan E. Paikin in Support of Defendant's Motion to Dismiss ("Paikin Declaration")

3. The parties agree that exhibits 3, 6, 13, and 14 to the Paikin Declaration should remain under seal in order to protect confidential business information. Plaintiff believes that exhibits 1-2, 4, 7-8, and 10 should also be maintained under seal in order to protect confidential business information, and Defendant does not object to the sealing of these additional documents.

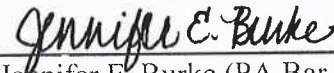
4. Defendant is filing, concurrently with this stipulation, a public version of the Paikin Declaration redacting exhibits 1-4, 6-8, 10, 13 and 14.

5. The unredacted version of the Paikin Declaration should be maintained under seal.

May 20, 2013

Respectfully submitted,

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ORDER

NOW, this ____ day of May, 2013, upon consideration of the parties' Joint Stipulation on Sealing of Documents, filed May 20, 2013,

IT IS ORDERED that the stipulation is approved.

James Knoll Gardner
United States District Judge

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Defendant.

CERTIFICATE OF SERVICE

I certify that on the date set forth below, the parties' Joint Stipulation on Sealing of Documents, together with a proposed order and attachments, was electronically filed through the Court's CM/ECF system, and that these documents are available for downloading and viewing from the CM/ECF system. Notice of this filing will be sent to all registered counsel of record by operation of the CM/ECF system.

May 20, 2013

Respectfully submitted,

WILMER, CUTLER, PICKERING,
HALE and DORR LLP

/s/ David W. Ogden
David W. Ogden (admitted *pro hac vice*)

Attorney for Ciech, S.A.